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14 **UNITED STATES BANKRUPTCY COURT**
NORTHERN DISTRICT OF CALIFORNIA
15 **SAN FRANCISCO DIVISION**

16 In re:

17 PG&E CORPORATION

18 - and -

19 PACIFIC GAS AND ELECTRIC
COMPANY,

20 Debtors.

- 21 ☐ Affects PG&E Corporation
22 ☐ Affects Pacific Gas and
Electric Company
23 ☒ Affects both Debtors

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

**DECLARATION OF MATTHEW C. HEYN
IN SUPPORT OF CAL OES'S
OPPOSITION TO OFFICIAL
COMMITTEE OF TORT CLAIMANTS'
OMNIBUS OBJECTION TO ITS CLAIMS**

Date: February 26, 2020
Time: 10:00 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

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26 I, Matthew C. Heyn, declare as follows,

27 1. I am a Deputy Attorney General with the California Department of Justice, which
28 is counsel to the California Governor's Office of Emergency Services ("Cal OES") and several

1 other state agencies that have asserted proof of claim in the above-captioned bankruptcy cases. If
2 called to do so, I could and would competently testify to the facts set forth below based on my
3 personal knowledge.

4 2. On October 21, 2019, I timely filed three proofs of claim on behalf of Cal OES
5 (the “**Original Proofs of Claim**”) in the above-captioned bankruptcy cases. One proof of claim
6 was for disaster assistance Cal OES provided in connection with the Butte Fire; one proof of
7 claim was for disaster assistance Cal OES provided in connection with the North Bay Fires; one
8 proof of claim was for disaster assistance Cal OES provided in connection with the Camp Fire.

9 3. On November 15, 2019, I filed three additional proofs of claim on behalf of Cal
10 OES, which were to amend the Original Proofs of Claim. Attached hereto as **Exhibit A** is a true
11 and correct copy of Cal OES’s amended proof of claim for disaster assistance in connection with
12 the Butte Fire. Attached hereto as **Exhibit B** is a true and correct copy of Cal OES’s amended
13 proof of claim for disaster assistance in connection with the North Bay Fires. Attached hereto as
14 **Exhibit C** is a true and correct copy of Cal OES’s amended proof of claim for disaster assistance
15 in connection with the Camp Fire.

16 4. Attached hereto as **Exhibit D** is a true and correct copy of the legislative history
17 for California Health and Safety Code Section 13009.6.

18 5. Attached hereto as **Exhibit E** is a true and correct copy of a Plan Support
19 Agreement between PG&E and a local entity as filed with the Securities and Exchange
20 Commission. This is one of many such agreements between PG&E and local California agencies.

21
22 I declare under penalty of perjury that the forgoing is true and correct. Executed on
23 February 12, 2020 at Los Angeles, California.

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26 Matthew C. Heyn
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